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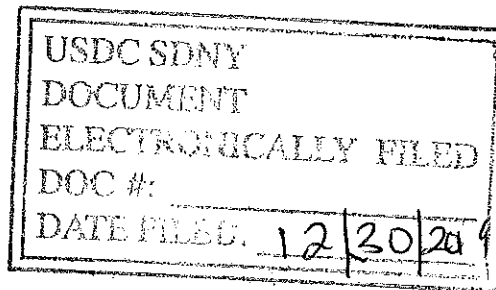
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BY ECF

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



December 27, 2019

Re: United States v. Zaquan McCutchen  
Dkt. No.: 19-CR-275

**MEMO ENDORSED**

Dear Judge Cote:

I am CJA counsel to Defendant Zaquan McCutchen in the above-referenced matter. I write to respectfully request that the Court modify Mr. McCutchen's conditions of release from home detention with electronic monitoring to a curfew enforced by location monitoring, with the curfew hours to be set at the discretion of Pretrial Services.

By way of background, Mr. McCutchen made his initial appearance on March 19, 2019 before the Honorable James L. Cott. Judge Cott ordered Mr. McCutchen's pretrial release on a \$250,000 personal recognizance bond, to be signed by six financially responsible people, home detention with electronic monitoring and travel restricted to the Southern and Eastern Districts of New York. Mr. McCutchen has remained compliant with all of the conditions of his release.

I have spoken with Pretrial Services, by officer Jonathan Lettieri, and they consent to this request. The government defers to Pretrial's position.

Your Honor's consideration is greatly appreciated.

*Edward V. Sapone*  
*Denise Cote*  
*12/30/19*

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone

cc: A.U.S.A. Frank Balsamello  
P.T.S.O. Jonathan Lettieri